

EXHIBIT 50

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARK I. SOKOLOW, et al.,

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PLAINTIFFS,

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-against-

Case No:
04CV397 (GBD) (RLE)

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THE PALESTINE LIBERATION ORGANIZATION, et
al.,

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DEFENDANTS.

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DATE: October 17, 2012

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TIME: 10:20 P.M.

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DEPOSITION of NEVENKA GRITZ,

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taken by the Defendants, pursuant to Notice

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and to the Federal Rules of Civil

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Procedure, held at the offices of Morrison

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& Foerster, 1290 Avenue of the Americas,

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New York, New York 10104, before Robert X.

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Shaw, CSR, a Notary Public of the State of

22

New York.

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1 Nevenka Gritz

2 Valery. Lycee Henry IV. Institut D'Etudes
3 Politiques and Sorbonne/Nanterre.

4 THE INTERPRETER: Correction.

5 It's -- the second school is
6 Arbalete.

7 Q. Thank you. And what was your
8 son doing in Jerusalem?

9 A. He had a one-year scholarship
10 to study, first, for three months Hebrew at
11 Hebrew University.

12 And after that he was to attend
13 Hartman Institute, and that would be
14 H-A-R-T-M-A-N.

15 Q. Do you have any sense of what
16 he would have chosen as a career?

17 A. I think he wanted to do
18 something at the international level, and
19 something that would contribute to peace,
20 and also keep studying religion.

21 He was to do his Ph.D., work on
22 his Ph.D. thesis, which would have been on
23 the Babel politics.

24 Q. Politics of Babel?

25 A. Yes.

1 Nevenka Gritz

2 Q. Okay. Now, on this particular
3 day, on July 31st, 2002, were you with your
4 son in Jerusalem?

5 A. No.

6 Q. Where were you?

7 A. In New York.

8 Q. Okay. Did you actually see
9 your son's body following the bombing?

10 A. No. Just the photograph, the
11 newspaper's photograph.

12 Q. Were you, was anyone able to
13 positively identify your son?

14 A. Yes. The Jerusalem police.

15 Q. Was there an autopsy done?

16 A. I don't think so. I know that
17 David was in the cafeteria. The bomb
18 exploded and he got a piece of the bomb in
19 the left side of his brain, and according
20 to the doctor, he was killed instantly.

21 Q. Okay. Which doctor was that
22 who reported this to you?

23 A. It was the doctor who was
24 checking the victims of the --

25 Q. Of the attack?

1 Nevenka Gritz

2 THE INTERPRETER: The attack.

3 Thank you.

4 A. I don't know his name.

5 Q. Did you speak to him,
6 personally?

7 A. That doctor?

8 Q. Yes. To the doctor.

9 A. Yes. Because all the bodies
10 were transferred to a special place in Tel
11 Aviv, and we were there and spoke with the
12 doctor.

13 Q. But the doctor didn't give you
14 any documents?

15 A. No. He didn't give me any
16 documents, but he told us that we could see
17 the pictures of the body, but Norman and I
18 didn't want to see any pictures.

19 Q. Okay. And did he also tell you
20 that your son died instantly?

21 A. Yes.

22 Q. So, there was no evidence,
23 then, that between the time of the blast
24 and the time of your son's death that your
25 son suffered, experienced any suffering?

1 Nevenka Gritz

2 Plaintiffs in a lawsuit against the
3 Palestinian Authority and the Palestine
4 Liberation Organization?

5 A. I don't understand the
6 question.

7 Q. Okay. Are you aware that you,
8 yourself, your husband's estate, and your
9 son's estate have brought a lawsuit against
10 the Palestinian Authority and the PLO?

11 A. No. No, I'm not aware of it.

12 Q. Well, the lawsuit for which we
13 have noticed this deposition has, is a
14 lawsuit against the Palestinian Authority
15 and the Palestine Liberation Organization.

16 Are you aware of any evidence
17 that the PLO, or the PA, had anything to do
18 with the bombing that resulted in your
19 son's death?

20 MR. SOLOMON: Note my
21 objection.

22 A. HAMAS is constantly bragging
23 about the fact that they want to destroy
24 Israel and kill as many people as they can.

25 MR. SOLOMON: All right. Let's

1 Nevenka Gritz

2 take a break.

3 (Whereupon, a short recess was
4 taken.)

5 MS. MATTA: Back on the record.

6 Q. Mrs. Gritz, do you have any
7 personal knowledge as to whether the PA, or
8 the PLO, knowingly did anything to cause
9 the bombing on July 31st, 2002?

10 MR. SOLOMON: That's a compound
11 question. Evidence, or personal
12 knowledge?

13 MS. MATTA: No. Do you have
14 any personal knowledge --

15 MR. SOLOMON: Okay. All right.
16 I misheard the question. That's
17 fine. Objection withdrawn.

18 A. No, I'm not.

19 Q. Okay. And have your lawyers
20 carried out investigations regarding the
21 underlying facts of this case?

22 MR. SOLOMON: Objection.

23 A. I hope they did.

24 MR. SOLOMON: By counsel, I
25 think we have.